

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3 - - - -

EXHIBIT

4 DANIEL GRAND,)
5 Plaintiff,)
6 -V-) CASE NO. 1:22CV01594
7 CITY OF UNIVERSITY HEIGHTS,) JUDGE BRIDGET
8 OHIO, et al.,) MEEHAN BRENNAN
9 Defendants.)
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12 The deposition of RAKHEL DAVIDOFF, a witness
13 herein, being called by the Defendants as if upon
14 cross-examination under the statute, and taken before
15 Megan A. Pisciotta, a Notary Public within and for the
16 State of Ohio, pursuant to the agreement of counsel, on
17 Wednesday, December 6th, 2023, at 10:00 a.m., at the Law
18 Offices of Mazanec Raskin & Ryder, 100 Franklin's Row,
19 34305 Solon Road, City of Solon, County of Cuyahoga, and
20 the State of Ohio.
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1 **was?**

2 A. No.

3 Q. **I take it those were handled by Mr. Grand?**

4 A. Yeah.

5 Q. **Okay. Did you participate in any of the**
6 **conversations or communications in attempt to resolve**
7 **those?**

8 A. To resolve the violations?

9 Q. **Yes.**

10 A. No.

11 Q. **So any information that you would have would be**
12 **based on what he told you? In other words, you have no**
13 **firsthand information about the resolution of those**
14 **issues?**

15 A. Yeah. I mean, if people came to the house to
16 take pictures or whatever, that I dealt with, but I
17 didn't deal with resolutions or anything like that.

18 Q. **Do you have any recollection of those instances**
19 **in which people came to your house to take pictures?**

20 A. I don't remember names, but somebody came to
21 take a picture of the outside, like the driveway area
22 that was an issue, and the person who came to take -- to
23 look at everything to give, I guess, the final
24 inspection of the house. I don't recall who was who.

25 Q. **Okay. Gotcha. Did you ever gain any**

1 **information as to the employer or organization of the**
2 **person who came to take pictures of the driveway?**

3 A. Meaning, like his name?

4 Q. **Who they were employed by?**

5 A. The city.

6 Q. **They identified themselves as a city employee?**

7 A. Yeah.

8 Q. **Okay. So what happened when the person came to**
9 **take pictures of the driveway?**

10 A. I let them take pictures.

11 Q. **You allowed them to take pictures?**

12 A. Uh-huh.

13 Q. **Okay. Where did they go in order to take these**
14 **photos?**

15 A. Of the driveway? Just to that front driveway
16 area.

17 Q. **And this is an area in front and to the side of**
18 **your house?**

19 A. Uh-huh.

20 Q. **I believe to the right side as you face the**
21 **house?**

22 A. Yeah.

23 Q. **Okay. Did they go beyond the areas that could**
24 **be viewed, for lack of a better word, from the street?**

25 A. I can't say for sure because I wasn't outside

1 monitoring them. They knocked on the door, I answered,
2 and said, sure, and he did what he had to do, but I
3 didn't watch him while he was doing it.

4 Q. **Okay.**

5 A. So I don't know if at any point in time he went
6 someplace else like to the left side of the house or
7 anywhere else.

8 Q. **Fair enough. The full area of your driveway can
9 be viewed from the street, if I recall correctly?**

10 A. Yes.

11 Q. **And I think you indicated that you were also
12 present when a final house inspection occurred?**

13 A. I think so, yeah.

14 Q. **Okay.**

15 A. I don't think it was the final one, but it was
16 one of them. One of the inspections.

17 Q. **Okay. And did you permit the inspector to do
18 the inspection?**

19 A. Yeah.

20 Q. **Where did that occur?**

21 A. Everywhere.

22 Q. **Inside the house, throughout the house?**

23 A. Yeah.

24 Q. **But that was with your permission?**

25 A. Yeah.

1 C E R T I F I C A T E

2 STATE OF OHIO,)
3 CUYAHOGA COUNTY.)

4 I, Megan A. Pisciotta, a Notary Public within and for
5 the State of Ohio, duly commissioned and qualified, do
6 hereby certify that the within named witness, RAKHEL
7 DAVIDOFF, was by me first duly sworn to testify to the
8 truth, the whole truth and nothing but the truth in the
9 cause aforesaid; that the testimony then given by the
10 witness was by me reduced to Stenotype in the presence
11 of said witness, afterwards transcribed upon a computer;
12 and that the foregoing is a true and correct
13 transcription of the testimony so given by the witness
14 as aforesaid.

15
16 I do further certify that this deposition was taken at
17 the time and place in the foregoing caption specified,
18 and was completed without adjournment.

19
20 I do further certify that I am not a relative, employee
21 of or attorney for any of the parties in the
22 above-captioned action; I am not a relative or employee
23 of an attorney of any of the parties in the
24 above-captioned action; I am not financially interested
25 in the action; and I am not, nor is the court reporting

Deposition of Rakhel Davidoff

Daniel Grand, vs. City of University Heights, Ohio, et al.

1 firm with which I am affiliated, under a contract as
2 defined in Civil Rule 28(D) .
3

4 IN WITNESS HEREOF, I have hereunto set my hand and
5 affixed my seal of office at Cleveland, Ohio on December
6 19th, 2023.

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10 Megan Pisciotta

11 Megan A. Pisciotta, a Notary Public

12 In and for the State of Ohio.

13 My Commission expires 9/21/28

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